

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

U.S. DISTRICT COURT
DISTRICT OF MAINE
PORTLAND
RECEIVED & FILED

UNITED STATES OF AMERICA

v.

CHRISTOPHER HAGAN

No.

2:23-cr-01-JAW

2023 JAN -5 P 1:00

DEPUTY CLERK

INDICTMENT

The Grand Jury charges:

Introduction

1. Defendant Christopher Hagan resided in Raymond, New Hampshire until about May 2019. In May 2019, Defendant moved to North Berwick, Maine.
2. J.C. is an individual known to the grand jury. J.C. resided in the District of New Hampshire and was employed by Company A.
3. Company A is a national defense contractor that provides equipment for military, law enforcement, and civilian use. Company A maintains a business location within the District of New Hampshire.
4. Between October 2017 and September 2021, J.C. was employed by Company A. J.C.'s primary role at Company A was to repair Advance Target Pointer Illuminator Aiming Laser (ATPIAL) devices.
5. Between October 2017 and September 2021, J.C. received used and/or broken ATPIALs designated for military and law enforcement use from Defendant.
6. Between October 2017 and September 2021, J.C. stole or converted new and used parts and components from Company A to repair ATPIALs received from Defendant. After repairing ATPIALs, J.C. transferred the ATPIALs to Defendant in

either the District of New Hampshire or the District of Maine.

7. J.C. also stole and converted intensifier tubes from Company A, at least some of which were transferred to Defendant.

8. On numerous occasions, Defendant sold ATPIAL devices and other equipment to customers in interstate commerce.

9. Defendant subsequently distributed portions of these proceeds to J.C. and others.

COUNT 1
(Conspiracy to Transport Stolen Property in Interstate Commerce)

10. Paragraphs 1-9 are realleged and incorporated by reference.

11. Between about October 2017 and July 2021, in the District of Maine and elsewhere, defendant

CHRISTOPHER HAGAN

knowingly and intentionally conspired and agreed with J.C. and others known and unknown to transport, transmit, and transfer in interstate commerce goods with a value of \$5,000 or more, knowing the same to have been stolen, converted, or taken by fraud.

Manner and Means

12. Paragraphs 1-9 are realleged and incorporated by reference.

Overt Acts

13. On numerous dates in 2017, Defendant received stolen property from J.C. for resale.

14. On numerous dates in 2018, Defendant received stolen property from J.C. for resale.

15. On numerous dates in 2019, Defendant received stolen property from J.C. for resale.

16. On numerous dates in 2020, Defendant received stolen property from J.C. for resale.

17. On numerous dates in 2021, Defendant received stolen property from J.C. for resale.

18. On about the following dates, Defendant sent electronic monetary transfers to J.C. that originated within the District of Maine and represented payment for stolen property:

Overt Act	Date	Amount
1	1/24/2019	\$500.00
2	7/19/2019	\$2,500.00
3	7/19/2019	\$3,000.00
4	9/21/2019	\$1,500.00
5	9/26/2019	\$1,900.00
6	10/7/2019	\$1,000.00
7	10/8/2019	\$2,000.00
8	10/13/2019	\$1,000.00
9	10/13/2019	\$1,000.00
10	11/19/2019	\$1,800.00
11	12/2/2019	\$2,000.00
12	12/10/2019	\$2,000.00
13	12/10/2019	\$1,000.00
14	3/19/2020	\$1,000.00
15	3/21/2020	\$3,000.00
16	3/26/2020	\$2,000.00
17	5/11/2020	\$2,000.00
18	5/11/2020	\$1,000.00
19	7/15/2020	\$1,000.00
20	7/15/2020	\$3,000.00
21	7/15/2020	\$2,000.00
22	7/15/2020	\$1,500.00
23	7/31/2020	\$1,000.00

All in violation of Title 18, United States Code, Sections 371 and 2314.

COUNTS 2-8
(Money Laundering)

19. Paragraphs 1-9 and 13-18 are realleged and incorporated by reference.

20. On about the dates set forth below, in the District of Maine and elsewhere,
Defendant

CHRISTOPHER HAGAN

knowingly conducted and attempted to conduct the following financial transactions affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, that is conspiracy to transport stolen goods in interstate commerce as charged in Count 1 of this Indictment, knowing that the transactions were designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, defendant knew that the property involved in the financial transactions, represented the proceeds of some form of unlawful activity.

COUNT	DATE	TRANSACTION AMOUNT
2	7/19/2019	\$2500.00
3	7/19/2019	\$3000.00
4	5/11/2020	\$2000.00
5	5/11/2020	\$1000.00
6	7/15/2020	\$3000.00
7	7/15/2020	\$1500.00
8	7/15/2020	\$2000.00

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

FORFEITURE ALLEGATION

21. Upon conviction of the offenses alleged in Counts 1-8 of this Indictment, Defendant

CHRISTOPHER HAGAN

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(7), any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

If any of the property described above, as a result of any act or omission of the defendant:

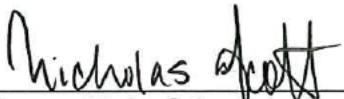
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL,

Signature Redacted – Original on file
with the Clerk's Office

Grand Jury Foreperson



Assistant United States Attorney

Date: January 5, 2023